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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Marlene H Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: Richardson Certification Filing for the Kalamazoo County, Michigan PSAP
WT Docket No. 03-70

Dear Ms. Dortch:

Pursuant to the City of Richardson Reconsideration Order,¹ enclosed is 'T-Mobile USA, Inc.'s certification with respect to the E911 request it has received from the Kalamazoo County, Michigan PSAP.

Please contact me at 202-654-5000 with any questions or concerns

Sincerely,



Robert A. Calaff
Senior Corporate Counsel
Governmental and Industry Affairs

¹ Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems. CC Docket No. 94-102, *Order on Reconsideration*, rel. Nov. 26, 2002 (City of Richardson Reconsideration Order).

No. of Copies rec'd 0+4
List ABOVE

CERTIFICATION OF TIM WONG

I, Tim Wong, certify:

1. This certification is made on behalf of T-Mobile USA, Inc. ("T-Mobile") under Section 20.18(j)(4) of the Commission's rules, 47 C.F.R. § 20.18(j)(4).
2. I am Chief Technology Officer of T-Mobile. **As** Chief Technology Officer, I am responsible for and have general knowledge of T-Mobile's deployment of E-911 service. To the extent this certification discusses E911 deployment on the Public Safety Answer Point's ("PSAP") side of the demarcation point, those portions of this certification are based on T-Mobile's best understanding of those facts and circumstances, which is based largely on the representations of the PSAP and/or its Local Exchange Carrier ("LEC").
3. Kalamazoo County, a Michigan PSAP, requested Phase I E911 service on March 20, 2001. More than **six** months have elapsed since the date of receipt of this request and the deployment has not been completed.
4. To the best of my knowledge, the PSAP known as the Kalamazoo County is currently not able to receive and utilize Phase I E911 data elements. I describe below the basis for this determination and reasons why further implementation efforts cannot be made until the PSAP becomes capable of receiving and utilizing the data elements associated with the E911 service requested.
 - (a)
 - (i) According to its records, T-Mobile provided the Kalamazoo County with map and data files on July 26, 2002 and requested on July 26, 2002 that the PSAP provide T-Mobile with routing instructions for the PSAP's E911 calls. The PSAP has not provided T-Mobile with the requested routing instructions.
 - (ii) Without routing instructions, T-Mobile cannot: complete and send the data file to the ALI database provider, perform Mobile Switching Center and Gateway Mobile Location Center data translations, or test the requested service. Until the PSAP provides routing instructions to T-Mobile so that T-Mobile can complete these steps, T-Mobile will not be able to transmit E911 data elements to the proper nodes within the area covered by the Kalamazoo County's request, and Kalamazoo County will therefore not be able properly to receive and utilize E911 data elements.
 - (iii) T-Mobile has contacted Kalamazoo County three times regarding the need for routing instructions via email and phone beginning October 2, 2002.
 - (b)
 - (i) According to T-Mobile's records, Kalamazoo County has not upgraded its Customer Premises Equipment ("CPE") for the requested service.

Until the PSAP upgrades its CPE, T-Mobile cannot complete Mobile Switching Center and Gateway Mobile Location Center data translations

because, as a practical matter, these translations must be completed close in time to final deployment to avoid repeating the translations due to underlying network changes, or test the requested service, and Kalamazoo County will not be able to receive and utilize the E911 data elements transmitted by T-Mobile.

5. Listed in Attachment "A," attached hereto, are the specific steps T-Mobile has taken to provide the requested service to the Kalamazoo County, and the specific steps that remain to be completed by T-Mobile. "Yes" means T-Mobile has completed that step. "Incapable" means T-Mobile cannot complete that step until the PSAP or LEC completes certain prerequisite steps, as described above. "N/A" means that the specific step is not applicable to the requested service in this instance (*i.e.*, it is a Phase I request and the specific step listed is Phase II only).
6. Listed in Attachment "B," attached hereto, are the specific steps that remain to be completed by the PSAP or other parties before T-Mobile can provide the E911 service requested. "Yes" means that, to the best of T-Mobile's understanding, the PSAP has completed that step. "No" means that, to the best of T-Mobile's understanding, the PSAP or other responsible party, has not completed that step. "N/A" means that the step is not applicable to the requested service in this instance. "Unknown" means that T-Mobile does not have sufficient knowledge to make any determination regarding the status of that step.
7. In accordance with Section 20.18(j)(4)(i) of the Commission's rules, on March 3, 2003, T-Mobile provided, by overnight, express delivery, written notice to Kalamazoo County of T-Mobile's intent to file this certification. Kalamazoo County did not respond to that notice.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on March 21, 2003, by:



Tim Wong
Chief Technology Officer

ATTACHMENT A to Certification of Tim Wong
Steps taken by T-Mobile toward E911 Implementation for Kalamazoo County

☒ Yes ☐ Incapable ☐ N/A

Built, tested, and inkgrated the Gateway Mobile Location Center ("GMLC") into T-Mobile's network

☒ Yes ☐ Incapable ☐ N/A

Built, tested, and integrated the Serving Mobile Location Cencler ("SMLC") into T-Mobile's network (Phase II only)

☐ Yes ☐ Incapable ☒ N/A

Built, tested, and inkgrated Location Measurement Unit(s) ("LMU") (Phase II, EOTD only)

☒ Yes ☐ Incapable ☐ N/A

Upgraded, tested, and patched software in Mobile Switching Center(s) ("MSC")

☒ Yes ☐ Incapable ☐ N/A

Upgraded, tested, and patched software in Base Station Controller(sj

☒ Yes ☐ Incapable ☐ N/A

Requested selective router location (CLLI codes) from the PSAP or obtained location from an alternate source

☒ Yes ☐ Incapable ☐ N/A

Sent coverage map(s) to the PSAP

☒ Yes ☐ Incapable ☐ N/A

Sent data file(s) to the PSAP

☒ Yes ☐ Incapable ☐ N/A

Requested routing instructions from the PSAP

☒ Yes ☐ Incapable ☐ N/A

Prepared network design diagram

☒ Yes ☐ Incapable ☐ N/A

Performed trunk sizing (*i.e.*, determined the number of trunks required)

☒ Yes ☐ Incapable ☐ N/A

Completed forms and exhibits for ordering trunks from LEC

☒ Yes ☐ Incapable ☐ N/A

Obtained PSAP authorization to order trunks, if applicable

☒ Yes ☐ Incapable ☐ N/A

Ordered trunk(s) from LEC

ATTACHMENT A

ATTACHMENT A to Certification of Tim Wong
Steps taken by T-Mobile toward E911 Implementation for Kalamazoo County

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> Incapable	<input type="checkbox"/> N/A	Ordered transport from LEC, if applicable
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> Incapable	<input type="checkbox"/> N/A	Tested trunks
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> Incapable	<input type="checkbox"/> N/A	Requested pANI assignment from LEC or obtained from an alternate source
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> Incapable	<input type="checkbox"/> N/A	Completed data file for delivery to PSAP
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> Incapable	<input type="checkbox"/> N/A	Sent data file to PSAP
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> Incapable	<input type="checkbox"/> N/A	Completed data file for delivery to ALI database provider
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> Incapable	<input type="checkbox"/> N/A	Sent data file to ALI database provider
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> Incapable	<input type="checkbox"/> N/A	Performed MSC data translation (script allowing routing of E911 voice to correct PSAP and identification of the receiving tower)
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> Incapable	<input type="checkbox"/> N/A	Performed GMLC data translation (script allowing routing of E911 data to correct PSAP and identification of the receiving tower)
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> Incapable	<input type="checkbox"/> N/A	Scheduled testing with PSAP
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> Incapable	<input type="checkbox"/> N/A	Performed profile test
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> Incapable	<input type="checkbox"/> N/A	Performed field test
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> Incapable	<input type="checkbox"/> N/A	Reconciled field test
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> Incapable	<input type="checkbox"/> N/A	Performed retest, if applicable
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> Incapable	<input type="checkbox"/> N/A	Accepted testing (provisioning complete)

ATTACHMENT A

ATTACHMENT B to Certification of Tim Wong
Actions Required By Kalamazoo County Or Other Parties Before T-Mobile Can Complete
E91 I Implementation

- ☐ Yes ☐ No ☒ Unknown ☐ N/A Requested service from LEC (PSAP)
- ☒ Yes ☐ No ☐ Unknown ☐ N/A Sent selective router location (CLLI codes) to T-Mobile (PSAP)
- ☐ Yes ☒ No ☐ Unknown ☐ N/A Sent routing instructions to T-Mobile (PSAP)
- ☐ Yes ☐ No ☒ Unknown ☐ N/A Upgraded Customer Premises Equipment ("CPE") (including Computer Aided Dispatch ("CAD"), Geographic Information System ("GIS"), and 10-digit capability) (PSAP)
- ☐ Yes ☐ No ☒ Unknown ☐ N/A Built Master Street Address Guide ("MSAG") (PSAP)
- ☐ Yes ☐ No ☒ Unknown ☐ N/A Completed data file upload (LEC)
- ☐ Yes ☐ No ☒ Unknown ☐ N/A Upgraded ALI database, if applicable (LEC)
- ☐ Yes ☐ No ☒ Unknown ☐ N/A Upgraded selective router, if applicable (LEC)
- ☐ Yes ☐ No ☒ Unknown ☐ N/A Provisioned trunks for T-Mobile (LEC)
- ☐ Yes ☐ No ☒ Unknown ☐ N/A Provisioned or upgraded trunks for PSAP (from Phase zero to Phase I or II), if applicable (LEC)

ATTACHMENT B